

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS

OCT 28 2015

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

BY
DEPUTY _____

UNITED STATES OF AMERICA

v.

BRIAN CASPER (01)
TAYLOR KEETH (02)

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§

NO. 6:15CR ⁶¹
JUDGE MHS/KNM

INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

COUNT 1

Violation: 18 U.S.C. §§ 2251(a)
and 2251(e) (Conspiracy to
Sexually Exploit Children)

From on or about August 24, 2015, through on or about August 25, 2015, the exact dates being unknown to the grand jury, in the Eastern District of Texas and elsewhere, the defendant, **Brian Casper**, did knowingly and willfully combine, conspire, and agree with others known to the grand jury to employ, use, persuade, induce, entice, and coerce, a minor, S.B., to engage in sexually explicit conduct for the purpose of transmitting any live visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transmitted using any means and facility of interstate and foreign commerce and knowing and having reason to know that such visual depiction was transmitted using any means and facility of interstate and foreign commerce.

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All in violation of 18 U.S.C. §§ 2251(a) and 2251(e).

COUNT 2

Violation: 18 U.S.C. §§ 2251(a),
2251(e), and 2 (Sexual
Exploitation of Children and
Aiding and Abetting)

On or about August 24, 2015 and August 25, 2015, in the Eastern District of Texas and elsewhere, the defendant, **Brian Casper**, acting in concert with and aided and abetted by persons known to the grand jury, did knowingly employ, use, persuade, induce, entice, and coerce, a minor, S.B., to engage in sexually explicit conduct for the purpose of transmitting any live visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transmitted using any means and facility of interstate and foreign commerce and knowing and having reason to know that such visual depiction was transmitted using any means and facility of interstate and foreign commerce.

All in violation of 18 U.S.C. §§ 2251(a), 2251(e), and 2.

COUNT 3

Violation: 18 U.S.C. §§ 2251(a)
and 2251(e) (Conspiracy to
Sexually Exploit Children)

On or about February 24, 2015, the exact date being unknown to the grand jury, in the Eastern District of Texas and elsewhere, the defendants, **Brian Casper** and **Taylor**

Keeth, did knowingly and willfully combine, conspire, and agree to employ, use,

persuade, induce, entice, and coerce, a minor, T.K., to engage in sexually explicit conduct for the purpose of transmitting any live visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transmitted using any means and facility of interstate and foreign commerce and knowing and having reason to know that such visual depiction was transmitted using any means and facility of interstate and foreign commerce.

All in violation of 18 U.S.C. §§ 2251(a) and 2251(e).

COUNT 4

Violation: 18 U.S.C. §§ 2251(a),
2251(e), and 2 (Sexual
Exploitation of Children and
Aiding and Abetting)

On or about February 24, 2015, in the Eastern District of Texas and elsewhere, the defendants, **Brian Casper** and **Taylor Keeth**, acting in concert with and aided and abetted by each other, did knowingly employ, use, persuade, induce, entice, and coerce, a minor, T.K., to engage in sexually explicit conduct for the purpose of transmitting any live visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transmitted using any means and facility of interstate and foreign commerce and knowing and having reason to know that such visual depiction was transmitted using any means and facility of interstate and foreign commerce.

All in violation of 18 U.S.C. §§ 2251(a), 2251(e), and 2.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

Pursuant to 18 U.S.C. § 2253

1. The allegations contained in Counts 1 through 4 of this indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 2253.

2. Pursuant to 18 U.S.C. § 2253, upon conviction of an offense in violation of 18 U.S.C. § 2251, the defendants, **Brian Casper** and **Taylor Keeth**, shall forfeit to the United States of America:

- a. Any visual depiction described in 18 U.S.C. § 2251, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Chapter 110;
- b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense; and
- c. Any property, real or personal, used or intended to be used to commit or to promote the commission of the offense.

The property to be forfeited includes, but is not limited to, the following:

- a. An Apple iPhone, model 6 Plus, cellular telephone, bearing serial number FK1NKW2JG5QJ;
- b. An HP Pavilion laptop computer, model DV9700, bearing serial number CNF82746RB;

- c. A Dell Inspiron laptop computer, model PP42L, bearing serial number JV2KKJ1;
- d. A Samsung Galaxy, model S3, cellular telephone, bearing IMEI 99000333418916;
- e. A Samsung Galaxy, model S5, cellular telephone, bearing MEID 99000474377215; and
- f. A LG, model LGUK410, tablet computer, bearing MEID 089446554201213970.

3. If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253(b) and by 28 U.S.C. § 2461(c).

4. By virtue of the commission of the offenses alleged in this indictment, any and all interest the defendants have in the above-described property is vested in the United States and hereby forfeited to the United States pursuant to 18 U.S.C. § 2253.

All pursuant to 18 U.S.C. § 2253 and the procedures set forth at 21 U.S.C. § 853,
as made applicable through 18 U.S.C. § 2253(b).

A TRUE BILL

Bk
GRAND JURY FOREPERSON

10-28-2015
Date

JOHN M. BALES
UNITED STATES ATTORNEY

Nathaniel C. Kummerfeld
NATHANIEL C. KUMMERFELD
ASSISTANT UNITED STATES ATTORNEY

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v.

BRIAN CASPER (01)
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JUDGE _____

NOTICE OF PENALTY

COUNTS 1 and 3

VIOLATION: 18 U.S.C. §§ 2251(a) and 2251(e)
Conspiracy to Sexually Exploit Children

PENALTY: Imprisonment of not less than fifteen (15) years nor more than thirty (30) years; a fine not to exceed \$250,000; or both such imprisonment and fine; and a term of supervised release of not less than five (5) years to life.

SPECIAL ASSESSMENT: \$100.00 each count

COUNTS 2 and 4

VIOLATION: 18 U.S.C. §§ 2251(a), 2251(e), and 2
Sexual Exploitation of Children and Aiding and Abetting

PENALTY: Imprisonment of not less than fifteen (15) years nor more than thirty (30) years; a fine not to exceed \$250,000; or both such imprisonment and fine; and a term of supervised release of not less than five (5) years to life.

SPECIAL ASSESSMENT: \$100.00 each count